

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA                    )  
  )  
  )  
v.    ) Criminal No: 10CR10275DPW  
  )  
JOSE LUIS BAEZ                                )  
  )

MOTION TO EXTEND DEADLINE FOR PRE-TRIAL FILINGS

Now comes the Defendant and respectfully requests that this Honorable Court extend the deadline for filing pre-trial motions and jury trial requests from August 14, 2012 until Friday, August 24, 2012.

As reasons hereof, the Defendant states the following:

1. Counsel expects the Defendant to plead guilty on Thursday, August 23, 2012 before the Honorable Justice Douglas P. Woodlock in the

2. In the event that the Defendant does not plead guilty on Thursday, August 23, 2012, the Defendant will make his filings the following day in anticipation of the Final Pre-Trial Conference on August 28, 2012.

Respectfully submitted,  
Jose Luis Baez,  
By and through his attorney,

/s/ Murat Erkan  
Murat Erkan, BBO: 637508  
300 High Street  
Andover, MA 01810  
(978) 474-0054

Dated: August 20, 2012

CERTIFICATE OF SERVICE

I, Attorney Murat Erkan, counsel for the Defendant, Jose Luis Baez, hereby certify that this document, filed through the ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on August 20, 2012.

/s/ Murat Erkan  
Murat Erkan

Date: August 20, 2012